

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

CRIMINAL NO. CR-09-20025

Plaintiff,

HONORABLE: AVERN COHN

-vs-

D-3 MONICA A. CONYERS,

OFFENSE: 18 U.S.C. §§ 371, 666(a)  
(Conspiracy to Commit Bribery)

Defendant.

SECOND SUPERSEDING INFORMATION

THE UNITED STATES ATTORNEY CHARGES:

COUNT ONE

(18 U.S.C. § 371, § 666 (a) -- Conspiracy to Commit Bribery  
Concerning Programs Receiving Federal Funds)

**D-3 MONICA ANN CONYERS**

Beginning on a date unknown and continuing until in or about December 2007, in the Eastern District of Michigan, defendant MONICA ANN CONYERS did knowingly and voluntarily conspire and agree with an *Aide* and others to corruptly solicit and demand for the benefit of herself and others, and to accept and agree to accept, things of value from persons while an agent of the City of Detroit, an entity that received more than \$10,000 in federal funding during the calendar year 2007, with the intent that CONYERS would be influenced and rewarded in connection with any business, transaction or series of transactions of a value of \$5,000 or more with the City of Detroit, in violation of Title 18, United States Code, Section 666(a).

Manner and Means

Defendant CONYERS and her co-conspirators executed the conspiracy by agreeing that CONYERS and her aide would receive money and other things of value by creating the perception in the payors' minds that CONYERS would be influenced in taking actions beneficial to the persons giving the things of value, using her authority as a member of the Detroit City Council.

Overt Acts

In furtherance of the conspiracy, and to effect its object, the co-conspirators committed the following overt acts, among others, in the Eastern District of Michigan and elsewhere:

1. On November 20, 2007, at approximately 3:15 p.m., CONYERS met with an individual sent by Rayford Jackson in the parking lot of the Butzel Family Center in Detroit and received an envelope containing cash.
2. On December 4, 2007, at approximately 2:30 p.m., an individual sent by Rayford Jackson met CONYERS and her aide in a McDonald's parking lot in Detroit, at which time the individual delivered an envelope containing cash.

**All in violation of Title 18, United States Code, Section 371.**

Respectfully submitted,

TERRENCE BERG  
United States Attorney

  
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MARK CHUTKOW  
Assistant United States Attorney

  
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R. MICHAEL BULLOTTA  
Assistant United States Attorney

Dated: June 22, 2009

United States District Court  
Eastern District of Michigan**Criminal Case Cover Sheet****Case Number**  
**09-20025**

NOTE: It is the responsibility of the Assistant U.S. Attorney signing this form to complete it accurately in all respects.

**Companion Case Information****Companion Case Number:**This may be a companion case based upon LCrR 57.10 (b)(4)<sup>1</sup>:**Judge Assigned:** Yes       No**AUSA's Initials:** *RM/B***Case Title:** USA v. D-3 Monica A. Conyers**County where offense occurred :** Wayne**Check One:**       **Felony**       **Misdemeanor**       **Petty**

- Indictment/ Information --- no prior complaint.  
 Indictment/ Information --- based upon prior complaint [Case number: ]  
 Information — based upon LCrR 57.10 (d) [Complete Superseding section below].

**Superseding Case Information:****Superseding to Case No:** 09-20025**Judge:** Avern Cohn

- Original case was terminated; no additional charges or defendants.  
 Corrects errors; no additional charges or defendants.  
 Involves, for plea purposes, different charges or adds counts.  
 Embraces same subject matter but adds the additional defendants or charges below:

<b><u>Defendant name</u></b>	<b><u>Charges</u></b>	<b><u>Prior Complaint (if applicable)</u></b>
Monica A. Conyers	18 USC §§ 371, 666(a)	N/A

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**Please take notice that the below listed Assistant United States Attorney is the attorney of record for the above captioned case.**

June 26, 2009

Date

*R. Michael Bullotta*

R. MICHAEL BULLOTTA

Assistant United States Attorney

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<sup>1</sup> Companion cases are matters in which it appears that (1) substantially similar evidence will be offered at trial, (2) the same or related parties are present, and the cases arise out of the same transaction or occurrence. Cases may be companion cases even though one of them may have already been terminated.